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REMARKS

The present response is intended to be fully responsive to all points of objection and/or rejection raised by the Examiner and is believed to place the application in condition for allowance. Favorable reconsideration and allowance of the application is respectfully requested. Applicants assert that the present invention is new, non-obvious and useful. Prompt consideration and allowance of the claims is respectfully requested.

Status of Claims

Claims 1-7 are pending in the application. Claims 1-7 have been rejected. Claim 1 has been amended. New claims 8 and 9 20 have been added. Applicants respectfully assert that no new matter has been added. Claim 1 has been voluntarily amended for clarification only. This amendment does not narrow the scope of the claim, nor is it being made for reasons of patentability. The amended claim is not subject to the complete bar against the use of the Doctrine of Equivalents as outlined in *Festo Corporation v. Shoketsu Kinsoku Kogyo Kapushiki Co., Ltd. a/ka/ SMC Corporation and SMT Pneumatics, Inc.*, as the amendment

CLAIM REJECTIONS

35 U.S.C. § 102 Rejections

In the Office Action, the Examiner rejected claims 1-7 under 35 U.S.C. § 102(b), as being anticipated by Kanaya et al. (EP 0879705A2).

As is well established, in order to successfully assert a *prima facie* case of anticipation, the Examiner must provide a single prior art document that includes every element and limitation of the claim or claims being rejected.

EP 0879705 to Kanaya et al. is directed to an inkjet printing system having a print head with a plurality of nozzle arrays, each nozzle array including a plurality of nozzles arranged at predetermined pitches in the secondary scanning direction. The printer records an image by an interlacing method using only some of the nozzles in each array to reduce banding effects. It is clear that an inkjet printing system and an inkjet printing method do not

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teach a method, which is relevant only to multi-beam plotters and to calibration of light intensity of the beams.

Independent claim 1 has been amended to include "*a calibration pattern*" for clarification reasons only.

Amended claim 1 recites "*creating digital data of a calibration pattern, ... wherein each of said rows comprises data to be exposed by one of said beams*".

In the Office Action, the Examiner contended that Kanaya et al. teaches "*creating digital data, wherein each row comprises data to be exposed by one of said beams*". Applicants strongly disagree to this statement.

As can be seen from the figures (see for example FIG. 18), the columns of EP 0879705 are the equivalents of the rows of the present application, as they are in the direction perpendicular to the first primary scan and each such column on the printed image comprise ink droplets jetted from more than one nozzle.

Therefore, it is not possible that the digital data associated with the printed image would comprise rows in a direction perpendicular to the scanning direction and that each such row comprises data to be exposed by one of the nozzles.

Furthermore, as stated above, Applicants believe that the comparison between an inkjet printing system having nozzles and a multi-beam plotter is improper for the subject application. Based on the above, Applicants respectfully submit that EP 0879705 does not teach at least "*creating digital data, wherein each row comprises data to be exposed by one of said beams*".

Therefore, EP 0879705 fails to teach all the limitations of amended claim 1, and consequently, EP 0879705 cannot anticipate claim as amended. Claims 2-9, are dependent, directly or indirectly, from independent claim 1 and include all the limitations of the independent claim. Therefore, EP 0879705 cannot anticipate claims 2-9.

In view of the preceding remarks, Applicants respectfully request that the rejection of claims 1 - 7 under 35 USC 102 be withdrawn.

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New Claims

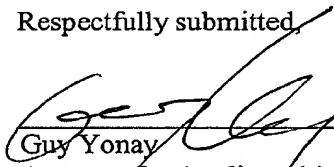
New claims 8 and 9, which are dependent from claim 1 have been added in order to further define what the Applicants consider to be the invention. Applicants respectfully assert that no new matter has been added.

In view of the foregoing amendments and remarks, the pending claims are deemed to be allowable. Their favorable reconsideration and allowance is respectfully requested.

Should the Examiner have any question or comment as to the form, content or entry of this Amendment, the Examiner is requested to contact the undersigned at the telephone number below. Similarly, if there are any further issues yet to be resolved to advance the prosecution of this application to issue, the Examiner is requested to telephone the undersigned counsel.

Please charge any fees associated with this paper to deposit account No. 05-0649.

Respectfully submitted,


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